

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

TIMMIA WILLIAMS,

Plaintiff,

-against-

JERSEY CITY BOARD OF EDUCATION;
GEKSON CASILLAS; ROSE WINSTEAD;
MARISSA SAVINO-GONZALEZ; JOHN
SMITH; and HOWARD ZLOTKIN,

Defendants.

No. 21 Civ. 12332

**STIPULATION
PERMITTING PLAINTIFF
TO FILE FIRST AMENDED
COMPLAINT**

WHEREAS on June 9, 2021, Plaintiff TIMMIA WILLIAMS filed her Complaint alleging, among other things, race discrimination against Defendants JERSEY CITY BOARD OF EDUCATION, GEKSON CASILLAS, ROSE WINSTEAD, MARISSA SAVINO-GONZALEZ, JOHN SMITH, and HOWARD ZLOTKIN;

WHEREAS Plaintiff seeks to file her First Amended Complaint, which adds factual allegations and four state law causes of action for negligent retention/supervision, negligent infliction of emotional distress, intentional infliction of emotional distress, and negligence, but adds no new parties;

WHEREAS Plaintiff's proposed First Amended Complaint is attached hereto as Exhibit A, and a redline version is attached hereto as Exhibit B;

IT IS HEREBY STIPULATED, by and between Plaintiff and Defendants, by and through their respective counsel, that:

1. Pursuant to Federal Rule of Civil Procedure 15(a)(2), Defendants give their consent to Plaintiff to file her First Amended Complaint, attached hereto as **Exhibit A**.

A redline version showing the changes from the original Complaint is attached as

Exhibit B.

2. Defendants reserve the right to file all appropriate responsive pleadings, including dispositive motions.

3. This stipulation may be executed in any number of counterparts and each counterpart shall be deemed to be an original. Electronic signatures shall be treated as an original document and shall have the same binding effect as an original signature on an original document.

Dated: December 21, 2021

KAUFMAN LIEB LEBOWITZ
& FRICK LLP

/s/ Alison Frick
Alison Frick
David Lebowitz*
Adam Strychaluk*
10 E. 40th Street, Suite 3307
New York, New York 10016
(212) 660-2332

Attorneys for Plaintiff

**Admitted pro hac vice*

ANDERSON & SHAH LLC

RShah

Roshan Shah
457 Haddonfield Road
Cherry Hill, New Jersey 08002
(732) 398-6545

Attorney for Defendant Zlotkin

ADAM GUTIERREZ & LATTIBOUDERE
LLC

Cherie L Adams

Cherie L. Adams
1037 Raymond Blvd., Suite 900
Newark, New Jersey 07102
(973) 735-2742

*Attorney for Defendants Jersey City
Board of Education, Casillas Winstead,
Savino-Gonzalez, and Smith*